



REFERENTIEL- SODERN

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REPERTOIRE DES MISES A JOUR / *CHANGE RECORD*

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SUPPLIER ETHICS CHARTER

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1. INTRODUCTION

At Sodern we conduct our business with integrity and pursue the highest standards of Ethics and Corporate Social Responsibility.

As a state partner company, strategically located in the National Defence structure, Sodern is fully aware of the duty of discretion and the imperative of reliability that weigh on it.

Respect for our customers and the chain of subcontractors, transparency and the desire to be a loyal competitor vis-à-vis our competitors guide our daily action.

The culture of Sodern, shaped by its history and the passion that characterises its teams, is accompanied by these principles that form the ethical foundation of our company. Respect for these principles, which are inseparable from our corporate culture, is a priority throughout our operations, including our supply chain and cannot be compromised.

We are thus determined to work with suppliers and subcontractors (hereafter designated by “the Supplier”) who share our ethical values and our ways of working. To ensure the highest standards of responsibility and integrity throughout our supply chain, it is expected that any supplier or Sodern personnel behave accordingly to the principles describe below for any type of procurement

We are confident that the Supplier is committed to respecting these ethical and corporate social responsibility standards. Therefore, we request that the Supplier commits to the SodernEthics Charter.

General Disclaimer

This Supplier Ethics Charter is in no way intended to conflict with or modify the terms and conditions of any existing contract. Unless otherwise stated in such contract, in the event of a conflict, suppliers shall adhere to the contract terms.

2. DESCRIPTION

2.1. FOCUSING ON PEOPLE

People are our most precious asset. The Supplier fosters the continued engagement of employees at all levels and promotes an environment of trust and collaboration in order to achieve best-in-class collective results.

2.1.1. Respecting people

The Supplier respects universal and inalienable human rights and fundamental employment rights as set in the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at work, internally and in its supply chain.

The Supplier respects personal dignity and privacy, and the rights of the individual. The Supplier does not tolerate any form of harassment, child labor, indentured or forced labor, modern slavery or human trafficking.

The Supplier respects all labor legislation applicable in the countries where it does business, along with the standards of the ILO Conventions. It ensures that all agreements on working hours are respected, with employees receiving an appropriate salary and benefit for their work.

2.1.2. Ensuring workplace health and safety

The Supplier provides a safe and healthy working environment for all employees. It maintains the highest standards of physical, mental and social well-being for its workers through relevant prevention, training and communication, and fosters improvements through worker health and safety committees. The Supplier respects applicable health and safety laws and develops an occupational health, safety and risks prevention policy in the workplace.

2.1.3. Encouraging open dialogue and whistleblowing

The Supplier develops a continuous, open and transparent social dialogue with employees and employees' representatives, in particular through appropriate collective bargaining structures. The Supplier promotes a speak-up culture where employees can express themselves freely and report any situation or behavior in breach of the law or general human rights or ethics principles as the ones described in this charter.

The Supplier provides its employees with avenues for raising legal or ethical issues or concerns without fear of retaliation, in line with the laws and regulations in force about the protection of whistleblowers. The Supplier takes action to prevent, detect, and correct any retaliatory actions.

2.1.4. Offering equal opportunities and supporting personal development and training

The Supplier supports diversity, offers equal opportunities for all employees and condemns any form of discrimination.

The Supplier develops the skills and know-how of their employees, both for their individual benefit and for collective success.

2.1.5. Protecting privacy and personal data

The Supplier always respects and protects the privacy of its employees, customers, suppliers and third parties. The Supplier complies with any applicable laws and regulations concerning how individual personal data is collected, processed and used.

The Supplier takes all precautions to protect Sodern's employees' personal data, and in particular to prevent them from being distorted, damaged or communicated to unauthorized third parties, by complying strictly with the European Union (EU) General Data Protection Regulation 2016/679 (GDPR).

The Supplier does not cause any cross-border transfer of Sodern's employees' personal data from a EU country to a country located outside the EU, unless authorized by Sodern and according to the conditions defined by Sodern.

Sodern Data Protection Officers should be contacted for any query.

2.2. RESPECTING AND PROTECTING ASSETS AND INFORMATION

Protecting our property, our information, our competencies and our know-how, as well as any assets entrusted to us, is key in order to build trust and maintain our competitiveness. The Supplier works to ensure that none of these assets are stolen, damaged, misused or improperly destroyed.

2.2.1. Protecting assets and information

The Supplier exercises care and diligence to ensure that all applicable security and information systems security requirements are met and that key assets, whether tangible or intangible, are protected. In particular, information is managed and hosted with the appropriate level of security.

Information should not be used for any purpose other than the business purpose for which it was provided and should be handled in accordance with the terms of its disclosure.



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2.2.2. Respecting property rights

The Supplier promotes the respect of both physical and intellectual property rights. The Supplier does not infringe the intellectual property rights of third parties, such as patents, trade secrets, trademarks, copyrights and other proprietary information.

2.2.3. Complying with defense regulations

The Supplier ensures compliance with all applicable internal and external security rules and regulations.

Any exchange or transmission of classified information or material strictly complies with the relevant security process.

2.2.4. Maintaining accurate records

The Supplier creates accurate records and does not alter any record entry to conceal or misrepresent the underlying transaction. All records, regardless of format, made or received as evidence of a business transaction, fully and accurately represent the transaction or event being documented. Records are retained based on the applicable retention requirements.

2.2.5. Trading securities

The Supplier and its personnel never use non-publicly disclosed information obtained in the course of their business relationship with Sodern as the basis for trading or for enabling others to trade in the securities of any company.

2.3. ENGAGING IN RESPONSIBLE BUSINESS PRACTICES

Upholding values of integrity, honesty and transparency, the Supplier aims at being a trustworthy partner for all its customers and stakeholders. The Supplier is committed to conducting its business in a highly responsible way, in compliance with applicable laws and regulations in all countries where it does business as well as applicable rules and procedures.

2.3.1. Respecting customers

The Supplier is committed to dealing honestly and fairly with all customers, whatever the size of their business, and to honor its contractual commitments.

2.3.2. Committing to product and service safety and quality

The Supplier complies with all applicable quality-control standards and procedures and delivers products and services that meet customer requirements for safety, high quality, cost and time effectiveness, and innovative technology with a continuous improvement mindset.

The Supplier namely develops, implements and maintains methods and processes appropriate to its products to eliminate the risk of introducing counterfeit parts and materials into deliverable products. Effective processes are also in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit products, and exclude them from the deliverable products.

2.3.3. Ensuring mutually beneficial relationships with suppliers and subcontractors

The Supplier is committed to sustaining fair relationships with its own suppliers and subcontractors and to securing its relationships with them to achieve goals of mutual benefit. This means promoting the exchange of best practices and sharing synergies where relevant.

2.3.4. Zero tolerance of corruption

Offering, giving, soliciting and receiving inducements, such as money, goods or services, with the intention of influencing a person, a corporation or a public official, is strictly prohibited.

The Supplier is committed to respect values of honesty and integrity. It does not tolerate any form of corruption, bribery, extortion, or embezzlement. The Supplier prevents corruption and abides with:

- The OECD Convention on Combating the Bribery of Foreign Public Officials in International Business Transactions;
- The OECD Guidelines for Multinational Companies (if relevant);
- The First Protocol to the Convention on the protection of the European Communities' financial interests and the Convention on the fight against corruption involving officials of the European Communities or officials of Member States of the EU as implemented by the member states;
- as well as any applicable local laws and regulations.

The Supplier exerts reasonable due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of intermediaries such as agents or consultants.

2.3.5. Gifts and business courtesies

The Supplier strictly refrains from offering, promising or granting any gift (including non-monetary gifts, invitations, services or any other advantage) to SodernSodern employees with the aim to influence the business relation, or which could be interpreted as an attempt to exert such influence.

Granting any gift of money or equivalent (voucher, gift-card), any trip or an all-inclusive package to a Sodernemployee is prohibited.Deviation to such rule will be subject to notification to ACO.

2.3.6. Avoiding conflicts of interest

The Supplier avoids all conflicts of interest or situations giving the appearance of a potential conflict of interest, including in its dealings with Sodern. The Supplier shall provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests ofSodern Sodern and personal interests or those of close relatives, friends or associates.

2.3.7. Competing and operating fairly

The Supplier adheres to existing laws that regulate competition, in particular to anti-trust laws. It does not fix prices or rig bids with competitors. The Supplier does not knowingly seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, nor allows anyone else to do so.

2.3.8. Combatting money laundering

The Supplier is committed to conducting business with parties who are involved in legitimate business activities and whose funds are, to its knowledge, derived from legitimate sources.

2.3.9. Complying with import and export laws

The Supplier ensures compliance with all applicable laws, directives and regulations governing the import and export of parts, components and technical data that may limit business with certain countries, corporations or persons. The Supplier provides truthful and accurate information and obtains export licenses where necessary.



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2.4. WORKING TOWARDS SUSTAINABILITY

The Supplier considers Ethics and Corporate Social Responsibility as key elements of business excellence. The Supplier is committed to integrating these principles in its strategy in order to foster sustainable growth and be a trusted partner for all stakeholders.

2.4.1. Establishing responsible business standards globally

The Supplier commits to developing processes and policies that foster Ethics and Corporate Social Responsibility in its corporate business practices and in its relations with all stakeholders. The Supplier acknowledges that reaching the standards established in this Charter is a dynamic process and commits to continuously improving its operations.

Commensurate with the size and nature of its business, the Supplier has management systems in place to maintain effective governance and support compliance with laws, regulations, and the expectations related to or addressed expressly within this Supplier Ethics Charter. The Supplier maintains effective programs to encourage its employees to make ethical, values-driven choices in their business dealings—beyond compliance with laws, regulations and contract requirements.

Upon request from Sodern, the Supplier shall demonstrate the means implemented in order to ensure adherence to the Supplier Ethics Charter.

2.4.2. Conducting responsible sourcing

The Supplier engages in responsible sourcing, namely by ensuring that the sourcing provisions defined here are also observed by all its subcontractors and suppliers. SodernSodern relies on the Supplier to communicate and actively promote the principles defined in this Supplier Ethics Charter throughout its entire supply chain.

The Supplier commits to exercising due diligence on its own supply chain, in line with national laws and international guidelines, and to provide Sodern with all relevant information upon request.

The Supplier namely commits to implementing all appropriate measures in its supply chain in order to guarantee that tin, tantalum and tungsten, their ores, and gold do not come from conflict-affected and high-risk areas (as defined by the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas).

2.4.3. Supporting community development

The Supplier promotes local initiatives for fair development of communities and territories, to benefit the areas in physical proximity to its sites or areas of impact. Where possible, it also contributes to the economic, social and educational well-being of local communities.

2.4.4. Respecting the environment and striving for eco-efficiency

The Supplier recognizes its responsibility to protect the environment. In addition to complying with environmental laws and regulations, the Supplier manages environmental risks and minimizes the environmental impact of its activities, products and services. This includes the prevention of pollution and the efficient use of resources. To continuously improve environmental protection, the Supplier considers international standards and the associated relevant methodologies. The Supplier tends toward eco-efficiency, which aims at maximizing the benefits of the products and services provided to customers and other stakeholders, while minimizing the environmental impact of these products throughout their lifecycle.



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Suppliers shall particularly endeavor to:

- minimize their consumption of water, materials, paper and energies and the amounts of waste generated;
- introduce local and international logistics processes that restrict these impacts and particularly the carbon footprint of the related activities;
- preserve natural resources;
- recycle their waste.

2.5. RESPECTING THE ETHICS CHARTER AND CONSEQUENCES OF A VIOLATION

Compliance with this Supplier Ethics Charter or an equivalent charter is a determining condition for Sodern to contract with the Supplier.

The Supplier fully abides by the standards set out in the Supplier Ethics Charter

The Supplier commits to providing Sodern with all relevant supporting information in this respect upon request and acknowledges that it will be liable to Sodern for all damages that could occur due to its lack of compliance with these obligations.

Should the Supplier notice or suspect any breach of regulations, laws or the Supplier Ethics Charter, the Supplier should immediately notify the Sodern contact person as well as the Ethics & Compliance department at alert-ethicscompliance@sodern.fr

In the event that the expectations of this Supplier Ethics Charter are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s).

3. GLOSSARY

CSR : Corporate Social Responsibility
OECD : Organization for Economic Co-operation and Development
ILO : International Labor Organization
GDRP : European Union General Data Protection Regulation 2016/679

Supplier's signature:

Name of the Company:

Date: / /

Title:

Signature: